

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

---

UNITED STATES OF AMERICA,	:
	:
	:
Plaintiff,	:
	:
	:
<i>ex rel.</i> ,	:
	:
JAMES DOGHARAMJI; SHEREE COOK;	:
and RACHEL BRYANT,	CASE NO. 3:11-cv-0442 (Sharp, J.)
	:
	:
Relators,	:
	:
v.	:
	:
COMMUNITY HEALTH SYSTEMS, INC.	:
<i>et al.</i>	:
	:
Defendants.	:
	:
	:

---

**RELATORS' MOTION TO REFER MATTER TO MAGISTRATE JUDGE  
AND TO SET COORDINATED STATUS CONFERENCE**

Relators Doghramji, Cook, and Bryant (“Doghramji Relators”) respectfully request that this matter be referred for case management purposes to Magistrate Judge Griffin and that a coordinated status conference be set with Judge Griffin concerning this matter and the following two matters:

1. *United States, et al. ex rel. Cook-Reska v. Community Health Sys., Inc., et al.*, No. 3:14-cv-02160;
2. *United States ex rel. Bryant v. Community Health Sys., Inc., et al.*, No. 3:14-cv-02195.

When the two cases above were recently transferred to this judicial district by Defendants over the objections of the relators, the Court issued an order referring each case to Magistrate Judge Griffin for case management. *See* Case No. 3:14-cv-02160, Doc. No 117; Case No. 3:14-cv-02195, Doc. No. 54. Since that time, Defendants have moved to consolidate the cases above

with the *Doghramji* case. (Doc. 123). In their Response to Defendants' consolidation motion, also filed today, the Doghramji Realtors argue that while consolidation is likely to be unnecessary, there is efficiency to coordinating the cases before Judge Griffin to resolve outstanding motions or anticipated motions. Relators also request that the Court require a coordinated status conference to take place before Judge Griffin concerning all three of these matters, in accordance with Rule 42 of the Federal Rules of Civil Procedure.

In this case, Relators' fee petition is fully briefed (Doc. Nos. 86, 115, and 125), and the defendants have twice filed motions asking the Court to stay its adjudication (Doc. Nos. 82, 109). In *Cook-Reska* and *Bryant*, the relators' fee petitions will presumably be filed and briefed over the coming weeks. And, in all three cases, the defendants have filed a motion to consolidate. (Doc. No. 123).

For these reasons, Relators request a coordinated status conference with Magistrate Judge Griffin to ensure that these pending and anticipated motions are addressed and litigated as expeditiously as possible.

Dated: December 2, 2014

Respectfully submitted,

/s/ David W. Garrison  
David W. Garrison (No. 24968)  
Scot P. Tift (No. 27592)  
**BARRETT JOHNSTON**  
**MARTIN & GARRISON, LLC**  
Bank of America Plaza  
414 Union Street, Suite 900  
Nashville, TN 37219  
Telephone: (615) 244-2202  
Facsimile: (615) 252-3798  
dgarrison@barrettjohnston.com  
stift@barrettjohnston.com

Reuben A. Guttman  
Traci L. Buschner  
**GRANT & EISENHOFER, P.A.**  
1747 Pennsylvania Avenue, N.W., Suite 875  
Washington, D.C. 20006  
Telephone: (202) 386-9500  
Facsimile: (202) 386-9505  
rguttman@gelaw.com  
tbuschner@gelaw.com

Kit A. Pierson  
David A. Young  
**COHEN MILSTEIN**  
**SELLERS & TOLL, PLLC**  
1100 New York Avenue, NW  
Suite 500 West  
Washington, DC 20005  
Telephone: (202) 408-4600  
Facsimile: (202) 408-4699  
kpierson@cohenmilstein.com  
dyoung@cohenmilstein.com

*Attorneys for Relators*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing *Relators' Motion to Refer Matter to Magistrate Judge and to Set Coordinated Status Conference* has been served on the following via the Court's ECF filing system:

John R. Jacobson  
William M. Outhier  
Riley Warnock & Jacobson, PLC  
1906 West End Avenue  
Nashville, TN 37203

Michael L. Waldman  
Robbins Russell Englert Orseck & Untereiner  
1801 K Street, NW  
Suite 411L  
Washington, D.C. 20006

Mark H. Wildasin  
Assistant United States Attorney  
Office of the United States Attorney  
Middle District of Tennessee  
110 Ninth Avenue, S  
Suite A961  
Nashville, TN 37203

on this the 2nd day of December, 2014

/s/ David W. Garrison  
DAVID W. GARRISON  
**BARRETT JOHNSTON**  
**MARTIN & GARRISON, LLC**